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U. S. District Court
EASTERN DISTRICT OF MISSOURI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT COURT of MISSOURI

JERRY B PUGH

5904 ENRIGHT #102

St. Louis, Mo 63112-6020

314-352 2677

JERRY PUGH

v.

NATIONAL PERSONNEL RECORD CENTER
9700 PAGE

St. Louis,MO 63114

Defendant.

COMPLAINT FOR INJUNCTIVE RELIEF

1. This is an action under the Freedom of Information Act, 5 U.S.C. § 552, to order the production of agency records, concerning MY COMPLETE MILITARY SERVICE RECORD TO INCLUDE MY FULL, UNEDITED MEDICAL RECORDS, MY 201 FILE AND ALL RELATED DOCUMENTS (TREATMENT HISTORIES, SPECIAL ORDERS FOR EXTRAORDINARY THERAPIES AND TREATMENT AND SPECIAL ORDERS FOR

has improperly withheld from plaintiff.

2. This court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B).

3. Plaintiff, JERRY PUGH, is THE PERSONAL OWNER OF THESE RECORDS and is the requester of the records which defendant is now withholding ILLEGALLY. Plaintiff has requested this information for use IN DETERMINING IRREFUTABLY DISABLED BOTH PHYSICALLY AND NEUROLOGICALLY DIRECTLY BECAUSE OF SENIOR ARMY PERSONNELS ABUSE OF AUTHORITY WITH EXTREME PREJUDICE; and prompt release of the information is essential to my receiving disability benefits that the US ARMY and the VETERANS ADMINISTRATION have with full knowledge and with malicious intent have with great vigor delay and deny me.

Because of the pernicious actions of these two agencies, I have been made subject to improper and exacerbating treatments that have caused me innumerable seizures, strokes and many other life threatening neuro-physical malaises. I AM DUE the JUSTICE THAT I HAVE SO APPRECIOSLY BEEN DENIED. The felonies committed against me by the US ARMY and the VETERANS ADMINISTRATION have committed on my person MUST immediate public interest in this information, etc. Only include this material if it is factually relevant in your case. It will be necessary to prove "good cause" to convince the Court to expedite consideration of your case. If expedited processing is not necessary in your case, omit this sentence and paragraph (2) from the request for relief.)

4. Defendant, the NATIONAL PERSONNEL RECORDS CENTER is an agency of the United States and has possession of the documents that plaintiff seeks.

5. By letter dated 20 April, plaintiff requested access to my complete military medical and 201 file. A copy of this letter is attached as Exhibit 1.

6. By letter dated [none has ever been issued to me] , plaintiff was denied access to the requested information on the grounds that it was exempt from disclosure under Exemption (NONE GIVEN, 5 U.S.C. §§ 552(b) NA. A copy of this letter is attached as Exhibit 2.

7. By letter dated NA, plaintiff appealed the denial of this request. A copy of this letter is attached as Exhibit 3.

8. By letter dated NA, plaintiff's appeal was denied. A copy of this letter is attached as Exhibit 4.

9. Plaintiff has a right of access to the requested information under 5 U.S.C. § 552(a)(3), and there is no legal basis for defendant's denial of such access.

WHEREFORE, plaintiff requests this Court:

(1) Order defendant to provide access to the requested documents;

(2) Expedite this proceeding as provided for in 28 U.S.C. § 1657;

(3) Award plaintiff costs and reasonable attorneys fees in this action, as provided in 5 U.S.C. § 552(a)(4)(E);
and

(4) Grant such other and further relief as may deem just and proper.

Respectfully submitted,

Your signature goes here


Name

Address

Dated: (date)

6 April 2010